

MAR 17 1997

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

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In the Matter of

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BellSouth Petition for Forbearance )  
from Application of Section 272 of the ) CC Docket No. 96-149  
Communications Act of 1934, as Amended, )  
to Previously Authorized Services )

**REPLY COMMENTS OF MCI TELECOMMUNICATIONS CORPORATION  
IN OPPOSITION TO BELL SOUTH PETITION FOR FORBEARANCE**

MCI Telecommunications Corporation (MCI), by its undersigned attorneys, hereby replies to the comments concerning BellSouth's Petition for Forbearance filed in this docket. As explained below, the initial comments confirm that application of the Section 272 separation and nondiscrimination safeguards to BellSouth's reverse directory and E911 services is necessary for the protection of competition and the public interest. BellSouth's request for forbearance from the application of those provisions to those services must therefore be denied.

Ameritech and Bell Atlantic support BellSouth's petition, and Bell Atlantic seeks blanket forbearance for all of the Bell Operating Companies' (BOCs') E911 services. Ameritech's comments add nothing of substance to the record, simply echoing BellSouth's assertions, based on the prior MFJ and Computer III waivers, that forbearance would be in the public interest and that application of Section 272 might "prove to be the death knell" for these services.<sup>1</sup> Bell Atlantic focuses on the E911 service aspect of BellSouth's petition and argues that it might

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<sup>1</sup> Ameritech Comments at 2.

not be possible to offer that vital public service under the Section 272 requirements.<sup>2</sup>

As MCI has explained, however, BellSouth's provision of these services while denying competitors access to a large portion of its directory assistance database is harmful to competition and contrary to the public interest. There is no reason to believe that providing competitors full access to the entire database used by BellSouth should "prove to be the death knell" of any competitive or valuable service.

Sprint also points out that BellSouth's public interest argument is based on an incorrect assumption -- namely, that its on-line reverse directory service was previously authorized by the MFJ Court. As Sprint explains, there are significant differences between BellSouth's traditional and on-line reverse directory services that make its MFJ waiver for its traditional service inapplicable to the on-line service. Thus, BellSouth still needs Section 271 authority to provide the on-line directory assistance service, making forbearance from the application of Section 272 especially inappropriate.<sup>3</sup> Indeed, as AT&T notes, forbearance from the application of Section 272 is a legal impossibility in the case of an in-region interLATA service for which Section 271 authority is needed.<sup>4</sup>

Finally, as AT&T and Sprint explain, BellSouth has not

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<sup>2</sup> Bell Atlantic Comments at 4-5.

<sup>3</sup> Sprint Comments at 2-4.

<sup>4</sup> AT&T Comments at 3 n.6.

satisfied the criteria for such forbearance under Section 10 of the Communications Act, 47 U.S.C. § 160, especially as to the nondiscrimination requirements of Section 272(c)(1) and (e).<sup>5</sup> Sprint points out that BellSouth's unique ability to provide its reverse directory assistance service with its monopoly local exchange service gives it a tremendous competitive edge over other providers of directory assistance and reverse directory services. Finally, as Sprint also notes, there is no reason that application of the Section 272 safeguards should create any unreasonable burdens for BellSouth's or any BOC's provision of such services, since the separate affiliate providing the services ought to be able to secure access to the BOC's directory assistance database at the same rates and on the same terms and conditions as all other providers.<sup>6</sup>

Accordingly, the other initial comments confirm MCI's position that BellSouth's request for forbearance from the application of Section 272 to its reverse directory and E911 services should be denied. At the very least, the petition should only be granted on condition that BellSouth make available to MCI and all other carriers all listings in BellSouth's directory database, including listings of other local exchange carriers, or that BellSouth not be permitted to use, for its

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<sup>5</sup> AT&T Comments at 4.

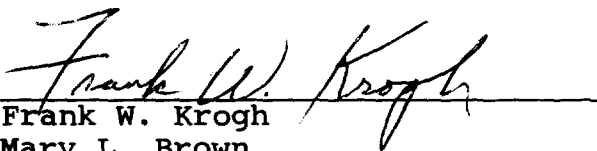
<sup>6</sup> Sprint Comments at 4-7.

reverse directory services, any such listings that are not provided to all other carriers.

Respectfully submitted,

MCI TELECOMMUNICATIONS CORPORATION

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Dated: March 17, 1997

**CERTIFICATE OF SERVICE**

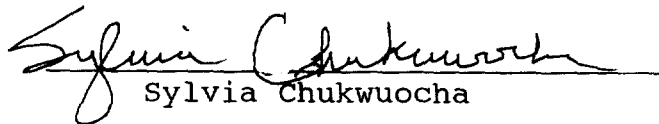
I, Sylvia Chukwuocha, do hereby certify that a true copy of the foregoing "REPLY COMMENTS" was served this 17th day of March, 1997, by hand delivery or first class mail, postage prepaid, upon each of the following parties:

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